



NATIONAL ASSOCIATION OF THE DEAF

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June 5, 1997

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JUN - 5 1997

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Federal Communications Commission
Office of Secretary

Re: In the Matter of Electronic Filing of Documents in
Rulemaking Proceedings, GC Dkt. No. 97-113

Dear Mr. Caton:

Enclosed please find an original and four copies of the Reply Comments of the National Association of the Deaf in the above captioned proceeding. Efforts to file these comments electronically were unsuccessful.

I would appreciate your referring all correspondence regarding this matter to my attention.

Sincerely,

Karen Peltz Strauss
Legal Counsel for Telecommunications Policy

cc: ITS

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ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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In the Matter of

Electronic Filing of Documents
in Rulemaking Proceedings

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GC Docket No. 97-113

*Federal Communications Commission
Office of Secretary*

REPLY COMMENTS OF

THE NATIONAL ASSOCIATION OF THE DEAF

The National Association of the Deaf ("NAD") hereby submits these reply comments to the Federal Communication Commission's ("FCC's" or "Commission's") Notice of Proposed Rulemaking (NPRM) in the above captioned proceeding.

The NAD is the nation's largest organization safeguarding the accessibility and civil rights of 28 million deaf and hard of hearing Americans in education, employment, health care, and telecommunications. The NAD is a private, non-profit federation of 51 state association affiliates including the District of Columbia, organizational affiliates, and direct members. The NAD seeks to assure a comprehensive, coordinated system of services that is accessible to Americans who are deaf and hard of hearing, enabling them to achieve their maximum potential through increased independence, productivity, and integration.

The NAD wishes to state its overwhelming support for the Commission's proposal to allow parties to file comments in FCC rulemaking proceedings via the Internet. As the Commission notes, allowing comments to be filed electronically will make it significantly

easier for individuals to present their views to the Commission.¹ This will be especially true for the millions of deaf and hard of hearing Americans who have come to rely on Internet access as an integral form of communication. The various costs and complications associated with filing comments on paper have often prevented these individuals from sharing their views with the Commission on matters which directly impact their jobs, education, and recreation. Indeed, over the past year and a half, innumerable proceedings brought under the Telecommunications Act of 1996 - including those on closed captioning, accessible telecommunications services, and telecommunications relay services - have promised to dramatically change the lives of deaf and hard of hearing individuals. For the most part, comments representing the interests of such individuals have been filed by national and local consumer organizations. While such consumer organizations will continue to represent the interests of these individuals in future proceedings, the availability of electronic filings will offer the Commission a more comprehensive look at the needs and desires of consumers directly affected by the outcome of Commission proceedings.²

Many of the Commission's proceedings affecting individuals with disabilities over the past year have been preliminary to notice and comment rulemakings. For example, the Commission's proceedings on telecommunications relay services and Section 255 of the Communications Act (on accessible telecommunications services), were in the form of a Notice of Inquiry (NOI). In addition, the Commission's initial proceeding on closed

¹ Of course this will only occur, however, if the Commission sets forth clear procedures on how to transmit comments electronically. Efforts to file these comments electronically were unsuccessful, even with individuals skilled in computer transmissions attempting to do so. The average consumer needs to be equipped with simple and straightforward instructions on submitting electronic filings.

² The NAD does, however, support the Commission's proposal to continue allowing parties to file comments on paper, as not everyone has access to electronic filing capabilities. NPRM ¶ 15.

captioning, issued in December of 1995, took the form of an NOI. The Commission now seeks comment on whether it should apply its electronic filing procedures to comments or pleadings filed in connection with NOIs and with other proceedings, such as petitions for rulemaking or reconsideration. NPRM ¶9. Because input from consumers on these types of proceedings is just as critical as is input on notice and comment proceedings, we urge the Commission to permit electronic filings in these proceedings as well.

In sum, we urge the Commission to take expedited action to permit electronic filings in FCC proceedings that seek public comment. Not only will filing electronically save the expense of making and transporting multiple paper copies, the Commission's proposal to require parties to submit only one electronic copy will also eliminate the difficulty and expense associated with ensuring that multiple parties receive copies of comments in a single docket. Finally, electronic filings will enable interested parties to readily access comments filed by others, from the FCC's Internet posting. This will greatly facilitate the preparation and submission of reply comments for individuals and consumers who do not have sufficient resources to purchase copies of comments initially filed with the Commission from the Commission's copy contractor.

Respectfully submitted,

A handwritten signature in cursive script that reads "Karen Peltz Strauss".

Karen Peltz Strauss
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